

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

FILED

MAY 15 2024

U. S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

v.

DAJUAN MARCELLUS,

and

KORDARYL CROSS,

Defendants.

4:24CR231 HEA/NCC

INDICTMENT

The Grand Jury charges that:

COUNT I

**INTERSTATE TRANSPORTATION OF STOLEN PROPERTY**  
**18 U.S.C. §§ 2314 & 2**

On or about January 11, 2023, in Ellisville, Missouri, within the Eastern District of Missouri, the defendants,

**DAJUAN MARCELLUS**  
**and**  
**KORDARYL CROSS,**

did unlawfully transport in interstate commerce, stolen property, that is, Rolex watches the value of which was \$5,000 or more, from the State of Missouri to the State of Illinois, knowing the same to be stolen.

All in violation of Title 18, United States Code, Sections 2314 & 2.

FORFEITURE ALLEGATION

The Grand Jury further finds by probable cause that:

1. Pursuant to Title 18, United States Code, Sections 981(a) and Title 28, United

States Code, Section 2461(c), upon conviction of an offense in violation of Title 18, United States Code, Section 2314 as set forth in Count I, the defendant shall forfeit to the United States of America any property, real or personal, constituting or derived from any proceeds traceable to such violations.

2. Subject to forfeiture is a sum of money equal to the total value of any property, real or personal, constituting or derived from any proceeds traceable to said violations, the amount of which is at least \$344,300.00.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America will be entitled to the forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL.

\_\_\_\_\_  
FOREPERSON

SAYLER A. FLEMING  
United States Attorney

\_\_\_\_\_  
Gwendolyn E. Carroll #4657003NY  
Assistant United States Attorney